

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 73 and 74 of the)	
Commission's Rules to Establish)	MB Docket No. 03-185
Rules for Digital Low Power Television,)	
Television Translator, and Television)	
Booster Stations and to Amend Rules)	
For Digital Class A Television Stations)	

COMMENTS OF
INTERNATIONAL BROADCASTING NETWORK

I.

International Broadcasting Network ("IBN") hereby submits its comments in response to the Notice of Proposed Rule Making ("NPRM") adopted by the Commission on August 6, 2003, and released on August 29, 2003. Because of time constraints, IBN's comments will be brief and limited to a few matters of great importance.

II.

Hundreds of communities and millions of viewers throughout the nation are served by low power television ("LPTV") stations. During the past two decades, no group of broadcasters has done more to serve the public interest than LPTV stations. Unlike many full power television stations, which are often owned by giant for-profit corporations having no motive other than to maximize revenues, LPTV stations have, for the past two decades, passionately pursued their commitment to the communities they serve. Despite the extreme hardships LPTV broadcasters have endured because of the regulatory restraints their stations have been subjected

to, they are eager to continue serving and to do everything within their power to make the digital transition a success.

III.

If the digital transition is to succeed, it is essential that all LPTV stations be given the opportunity to fully participate in the transition in a manner that will ensure their viability and permanence. The concept of secondary status should have no relevance in the digital realm. It is of vital importance that digital LPTV stations have permanent and unconditional primary status. Without primary status, LPTV broadcasters will be unable to obtain the financing to make the transition.

IV.

Among other issues of importance to digital LPTV stations are (a) realistic power limits, (b) freedom from unnecessary regulatory burdens, (c) standardization of call sign suffixes, (d) use of second channels for DTV and (e) continuation of analog service for a sufficient period of time. Each of these issues will be separately addressed.

V.

The NPRM's proposed power limits for digital LPTV stations may be inadequate. The proposed power limits for VHF stations are of particular concern. Moreover, it is noted that no distinction between low-band VHF and high-band VHF has been proposed. That anomaly should be addressed so that the power limits of digital LPTV stations will bear an appropriate and consistent proportional relationship to the power limits of full power stations in the same band. The propagation characteristics of high-band VHF are much different than those of low-band VHF. Accordingly, the power limits for high-band VHF stations should differ substantially from those of low-band VHF stations. In addition, the power limits for all digital LPTV stations may need to be adjusted upward.

VI.

The Commission should summarily reject all proposals to encumber digital LPTV stations with unnecessary regulatory burdens. Those proposing such burdens often are seeking to restrain competition or gain unfair advantage. If given the opportunity and the freedom to do so, LPTV broadcasters will work their hearts out to serve the public interest with the utmost excellence. They do not need to be subjected to burdensome regulations that will inhibit their stations' viability or lead to financial ruin.

VII.

Standardized call sign suffixes should be used by all television broadcasters, whether full power or low power, to avoid the kind of confusion that a multiplicity of suffixes can lead to. The suffix "LP", which is shared with LPFM stations, inappropriately stigmatizes analog LPTV stations and leads to confusion because it is used for both television and radio. All analog television stations, whether full power or low power, should be given the right to use the suffix "TV" or, at their election, no suffix at all. Likewise, all digital television stations, whether full power or low power, should be given the right to use the suffix "DT."

VIII.

All LPTV stations should be awarded second channels for DTV in order that they may continue serving their present audiences while encouraging viewers to switch to their DTV signals. Abrupt cutoff of analog signals will infuriate the public and endanger the success of the transition. A gradual transition to DTV is in the public interest. There will need to be dual facilities on separate channels for an adequate period of time.

IX.

The digital transition is of immense importance to the public and to all LPTV broadcasters as well. The Commission should give the highest priority to ensuring that all LPTV stations successfully make the transition to DTV.

Respectfully submitted,

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